

**KELLEY DRYE & WARREN LLP**

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Vin Di Bona and Cara  
Communications Corporation

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO**

Elias Stavrinides,  
Kristi Stavrinides

Plaintiffs,

v.

Vin Di Bona, individually, CARA  
COMMUNICATIONS CORPORATION d/b/a/  
Vin Di Bona Productions,

Defendants.

Case No. 3:17-cv-05742-WHO

(Assigned to Hon. William H. Orrick)

**DECLARATION OF ANDREAS  
BECKER IN SUPPORT OF  
DEFENDANTS VIN DI BONA AND  
CARA COMMUNICATIONS  
CORPORATION'S MOTIONS TO  
DISMISS PLAINTIFFS' COMPLAINT  
AND TO TRANSFER VENUE TO THE  
CENTRAL DISTRICT OF  
CALIFORNIA**

*[Reply Memoranda And Supplemental  
Declaration of David E. Fink Filed  
Concurrently Herewith]*

Date: January 10, 2018  
Time: 2:00 p.m.  
Judge: Hon. William H. Orrick  
Courtroom: 2

Action Filed: October 5, 2017  
Trial Date: None Set

**DECLARATION OF ANDREAS BECKER**

I, Andreas Becker, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an associate with Kelley Drye & Warren LLP, attorneys of record for Defendants Vin Di Bona and Cara Communications Corporation (“Cara”) (collectively, “Defendants”). I submit this declaration in support of Defendants’ Motions to Dismiss Plaintiffs’ Complaint and to Transfer Venue to the Central District of California. I have personal knowledge of the facts set forth herein, except those stated on information on belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. On Christmas, December 25, 2017 at approximately 9:18 p.m., my office received an email from the email address punchdrunk76@gmail.com, which is the email address that I and my office have used to correspond with Plaintiff Elias Stavrinides in this action. That email contained two attachments, entitled “STAVRINIDES OPPOSITION TO 12B6.doc” (the “First Opposition”) and “STAVRINIDES OPPOSITION TO CNG VENUE.doc” (the “Second Opposition”). A copy of that email, with the documents attached thereto, is attached to the Supplemental Declaration of David E. Fink, filed concurrently herewith.

3. I downloaded copies of the two documents attached to that email. For each document, I right-clicked the document and clicked “Properties.” When the “Properties” window opened, I selected the “Details” tab. True and correct copies of screenshots of relevant portions of the “Details” tab for each document are included below. Under the “Details” tab, for each document, the “Date last saved” was identified as December 23, 2017. Specifically, the First Opposition showed the “Date last saved” as **12/23/2017 5:56 PM**. The Second Opposition showed the “Date last saved” as **12/23/2017 8:46 PM**. In addition, the “Content created” was also identified for each document as December 23, 2017.

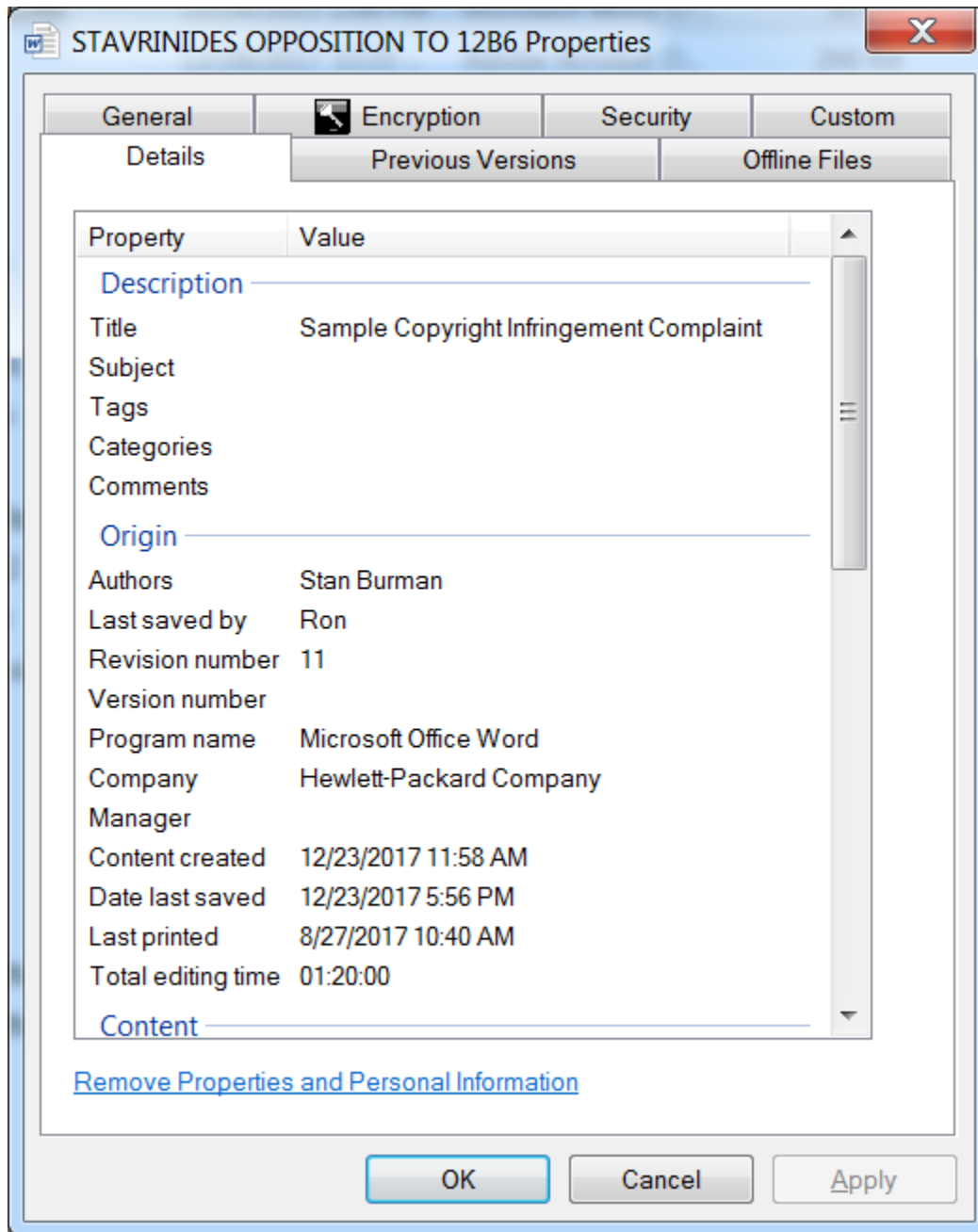
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**Screenshot for the First Opposition's "Details" Tab**



**Screenshot for the Second Opposition's "Details" Tab**

STAVRINIDES OPPOSITION TO CNG VENUE Properties

General Encryption Security Custom

Details Previous Versions Offline Files

Property	Value
<b>Description</b>	
Title	Sample Copyright Infringement Complaint
Subject	
Tags	
Categories	
Comments	
<b>Origin</b>	
Authors	Stan Burman
Last saved by	Ron
Revision number	6
Version number	
Program name	Microsoft Office Word
Company	Hewlett-Packard Company
Manager	
Content created	12/23/2017 5:57 PM
Date last saved	12/23/2017 8:46 PM
Last printed	8/27/2017 10:40 AM
Total editing time	02:49:00
<b>Content</b>	

[Remove Properties and Personal Information](#)

OK Cancel Apply

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed January 2, 2018, at Los Angeles, California.

  
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Andreas Becker